



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 1, 2022

BY ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gregoire Tournant*, 22 Cr. 276 (LTS)

Dear Chief Judge Swain:

The Government writes in advance of the arraignment and initial pretrial conference in this matter, scheduled for June 2, 2022 at 3:30 p.m., respectfully to advise the Court of a bail package that the parties have agreed to and are proposing to the Court. The components of the proposed package are as follows:

- \$20 million personal recognizance bond, co-signed by three individuals. Those three co-signers have already been interviewed and approved by the Government, and will co-sign the bond no later June 3, 2022.
- The personal recognizance bond is to be secured by (a) five properties owned by the defendant in Colorado; and (b) a pledge of the defendant's retirement accounts and life insurance policies that have a collective balance of approximately \$3.9 million. With respect to the properties, defense counsel has already provided the Government with a confession of judgment that has been recorded with the county recorder in Colorado. With respect to the retirement accounts and life insurance policies, the defense will provide to Pretrial Services and the Government, by letter dated June 2, 2022, the account numbers and financial institutions at which the accounts and policies are held, and the parties respectfully request that the account information not be included in the public version of the bond.
- The defendant shall not change the beneficial ownership, control, or assignment of the retirement accounts that are pledged as security for the bond. The defendant further shall not withdraw or transfer any funds from those retirement accounts. No later than June 9, 2022, the defendant shall provide a mechanism for immediate liquidation of those retirement accounts in the event of a violation of the terms of pretrial release.
- Travel restricted to the District of Colorado, District of Nevada, Southern and Middle Districts of Florida, and Southern District of New York, with points in between for travel.

